

EXHIBIT 11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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loanDepot.com, LLC, :

Plaintiff, :

v. : Case No.: 22 CIV. 5971

CROSSCOUNTRY MORTGAGE, LLC, KEISHA :

ANTOINE, SCOTT BONORA, STUART :

KOLINSKY, BARRY KOVEN, ENRICO :

MARTINO, SCOTT NADLER, EMELINE :

RAMOS, ROBERT RAUSH, MICHAEL SECOR, :

ERIKA VIGNOLA, and YAN ZHENG, :

Defendants. :

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Deposition of

ANTHONY AYALA

Conducted Virtually

Wednesday, May 17, 2023

12:03 p.m. EDT

Job No.: 492875

Pages: 1 - 169

Reported by: Cassidy Western, RPR

Transcript of Anthony Ayala
Conducted on May 17, 2023

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1 stay together, or did you guys break apart?

2 A We stuck together.

3 Q Okay. Was there ever any time at
4 that -- during that day where you guys broke
5 apart, or were you together the whole time?

6 A We were together the whole time.

7 Q Okay. How many meetings with
8 CrossCountry representatives do you recall having?

9 A That day?

10 Q That day.

11 A I mean, there were several back-to-back
12 meetings or one long meeting with different
13 speakers and breaks.

14 Q Okay. Who -- can you list for me all of
15 the CrossCountry representatives that you can
16 recall taking part in those meetings?

17 A I cannot.

18 Q Okay. Did Mr. Lieberman take part in
19 those meetings?

20 A Yes. I'm not sure if he spoke.

21 Q Okay. Did Mr. Reid take part in those
22 meetings?

23 A He attended, but I'm not sure if he
24 spoke.

25 Q Did Mr. Leonhardt take part in those

Transcript of Anthony Ayala
Conducted on May 17, 2023

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1 meetings?

2 A Yes.

3 Q Did Mr. Leonhardt speak?

4 A Yes.

5 Q What did Mr. Leonhardt speak about?

6 A I don't remember, to be honest. Just,
7 you know, overall things about the company.

8 Q Okay. Did Tim Roach speak?

9 A I don't recall that name.

10 Q Okay. As you sit here today, do you
11 know who Tim Roach is?

12 A No.

13 Q Do you recall people other than Ron
14 Leonhardt speaking during the meeting?

15 A Yes.

16 Q Can you recall any of their names as you
17 sit here today?

18 A No.

19 Q Were there any materials provided to the
20 loanDepot group during those meetings?

21 A I would say possibly yes.

22 Q Do you recall, one way or the other,
23 whether you received any documents from anyone at
24 CrossCountry on that -- during that trip?

25 A I'm thinking if any documents were